



April 12, 2017

VIA ECF

Magistrate Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Eugenie Bouchard v. United States Tennis Association, et al.
Civ. Case No. : 1:15-cv-5920

Dear Judge Bloom:

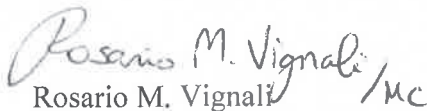
This office represents the Defendants in the above matter. This letter is written in response to Plaintiff's pre-motion letter of April 7, 2017 (Dkt. no. 22).

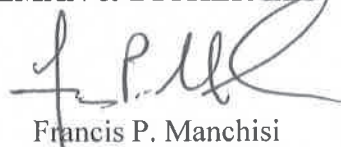
Defendants respectfully disagree with the position taken by Plaintiff's counsel in his letter. Defendants preserved all documents and video footage, as well as other materials, requested by Plaintiff's counsel's office at the time that Defendants were advised of Plaintiff's claim and preservation request. Defendants otherwise followed their standard retention policies with respect to all documents and video footage within its 43-acre facility in Queens. Plaintiff requested additional video footage of specific areas more than 14 months after the original notice of Plaintiff's claim.

Defendants look forward to discussing this matter further with Your Honor during any upcoming conference that the Court may convene.

Very truly yours,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP


Rosario M. Vignali /mc


Francis P. Manchisi

cc: Morelli Law Firm (via ECF)

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